
Privacy Policy

FirstStep.ai, its affiliates and subsidiaries ("Company" or "we" or "us" or "our") respect your privacy and are committed to protecting it through our compliance with this Privacy Policy (the "Policy"). This Policy is meant to help you understand what information we collect when you visit our websites, mobile websites, and mobile applications available at: <https://firststep.ai> (our "Websites and Mobile Apps"), why we collect it, and how you can access, update, manage, export, and delete your information. By accessing or using the Websites and Mobile Apps, you agree to this Privacy Policy.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it.

FirstStep.ai acts as Data Controller and/or Processor, as defined by the Data Protection Act 2017 (the "DPA"), with respect to any information collected.

We may revise and update this Agreement from time to time in our sole discretion and without notice. All changes are effective immediately when we post them and apply to all access to and use of the Websites and Mobile Apps thereafter. Your continued use of the Websites and Mobile Apps following the posting of a revised Agreement means that you accept and agree to the changes. You are expected to check this page from time to time so you are aware of any changes, as they are binding on you.

1. Who We Are

This Policy is issued on behalf of FirstStep.ai, including its affiliates and subsidiaries. When we refer to "FirstStep.ai", "we", "us" or "our" in this Policy, we are referring to the legal entity responsible for collecting and processing your data in accordance with applicable privacy legislation.

We are a private company incorporated in the Republic of Mauritius. As a provider of intelligent software systems, we are committed to protecting your personal data and complying with global data protection obligations, including the Mauritius Data Protection Act 2017, the General Data Protection Regulation (GDPR), and other applicable frameworks.

Depending on the context, FirstStep.ai may act as either a Data Controller (where we determine the purpose and means of processing personal data) or a Data Processor (where we process personal data on behalf of another controller).

Registered Legal Entity

[FirstStep.ai](#) Limited
c/o Schindlers Trust Mauritius Limited
The Hybrid, 3rd Floor, 634 La Promenade
Telfair, Moka, Mauritius

General Contact Information

Email: legal@firststep.ai
Support: support@firststep.ai

Data Protection Officer (DPO)

Our appointed Data Protection Officer is responsible for overseeing questions relating to this Policy and our data protection practices. To contact our DPO, email: legal@firststep.ai (Please include "Attn: Data Protection Officer" in the subject line)

2. What Data We Collect

We collect various types of information in order to provide, operate, maintain, and improve our Websites and Mobile Apps, as well as to meet our contractual and legal obligations.

This includes:

a. Information You Provide to Us Directly

When you interact with our services, we may collect:

- Your full name, email address, phone number, and mailing address
- Account credentials and preferences
- Any personal data provided via contact forms, service enquiries, surveys, demo requests, or feedback
- Details of communications between you and FirstStep.ai, including support tickets, emails, or calls

b. Information We Collect Automatically

Through your use of the Websites and Mobile Apps, we may collect:

- IP address, device type, operating system, browser type, language preferences
- Usage data, including click patterns, referring pages, pages visited, time spent, and error reports
- Session identifiers, authentication cookies, and activity logs
- Geo-location or time zone settings (if browser-enabled)

c. Information from Other Sources

We may receive data about you from:

- Our business partners or service providers
- Public databases and social media platforms, in accordance with their terms

d. Information During Software or Service Use

When we deliver services or provide software tools to you, we may process:

- Dataset content uploaded or analysed via our platform
- Metadata associated with data files or annotations
- Logs generated during test facilitation or on-site deployment

e. Information Through Cookies

Cookies and similar technologies collect data on your session behaviour. These may be used to:

- Store user preferences
- Track analytics

- Enhance user experience (See Section 11 and our Cookie Policy for more detail.)

3. Why We Collect Your Data

We collect and use your personal data only when we have a valid legal basis to do so, and only for clearly defined purposes. These purposes include:

a. Service Delivery

- To provide you access to our Websites, Mobile Apps, and platform features
- To deliver software tools, process data you submit, and maintain service performance
- To personalise and optimise your experience across devices and sessions

b. Customer Support and Communications

- To respond to your enquiries, support requests, and feedback
- To notify you of service issues, updates, and system outages
- To send onboarding, feature guidance, and educational resources

c. Legal and Contractual Obligations

- To comply with applicable laws and regulatory requirements (e.g. tax, anti-fraud, data protection)
- To fulfil obligations under service agreements or customer contracts

d. Analytics and Improvement

- To analyse user interactions, usage trends, and feature engagement
- To improve the performance, stability, and functionality of our services
- To conduct product research, quality assurance, and testing

e. Security and Fraud Prevention

- To detect, investigate, and prevent fraud, abuse, unauthorised access, or harm
- To protect the integrity of our systems and the safety of our users

f. Marketing (with consent)

- To send promotional emails, updates, event invitations, or content offers
- You may opt out at any time by clicking the unsubscribe link or contacting legal@firststep.ai

We will not use your personal data for purposes that are materially different without first notifying you and obtaining consent where required.

4. Lawful Basis for Processing

We only process your personal data where we have a lawful basis to do so under applicable data protection laws, including the Data Protection Act 2017 and GDPR. These bases include:

a. Consent

We process your data when you give us clear permission to do so, such as:

- Subscribing to newsletters
- Accepting cookies
- Registering for marketing communications

You may withdraw consent at any time by contacting legal@firststep.ai.

b. Contractual Necessity

We process your data to fulfil our obligations under a contract with you or to take steps at your request before entering into a contract, such as:

- Creating your account
- Providing access to our software
- Delivering technical support

c. Legal Obligation

We may process data where necessary to comply with applicable laws, such as:

- Retaining invoices for tax records
- Complying with data subject rights requests
- Responding to court orders or regulatory requests

d. Legitimate Interests

We may process your data when it is necessary for our legitimate business interests, and these interests are not overridden by your rights or freedoms. This includes:

- Improving our services
- Preventing fraud and abuse
- Securing our systems and networks
- Understanding how our services are used

If you have questions about the legal basis for processing your data, please contact our Data Protection Officer via legal@firststep.ai.

5. How We Use Your Data

We use the personal data we collect to operate, provide, and improve our services. Specifically, we may use your information to:

a. Operate and Maintain Our Services

- Authenticate your identity and manage account access
- Deliver the services and features you request
- Facilitate service configuration, onboarding, and deployment

b. Communicate With You

- Respond to enquiries and provide customer support
- Notify you of updates, changes, or technical issues
- Send system alerts, billing notifications, or service messages

c. Improve Service Performance

- Analyse usage patterns to improve interface design, usability, and uptime
- Monitor performance and debug issues
- Develop and test new features or product improvements

d. Provide Recommendations and Content

- Suggest features or services based on past usage
- Remember user preferences and session settings
- Customise your experience based on device or location

e. Promote Our Services (Only With Consent)

- Send marketing or promotional messages
- Inform you of webinars, events, or content relevant to your interests
- Measure effectiveness of marketing campaigns

You may opt out of promotional emails at any time by clicking “unsubscribe” in any message or contacting legal@firststep.ai.

f. Ensure Security and Legal Compliance

- Detect and respond to security threats
- Prevent unauthorised access, fraud, or abuse
- Comply with legal obligations and contractual requirements

We do not use your data for profiling or automated decision-making that produces legal effects without your consent or a legal basis.

6. Data Sharing and Disclosures

We do not sell your personal data. We only share it when necessary and in accordance with this Policy.

a. Service Providers and Partners

We may share your data with trusted third-party vendors and partners who perform services on our behalf, such as:

- Cloud hosting and infrastructure providers
- Analytics and monitoring services
- Customer support platforms
- Communication tools

All third parties are bound by confidentiality and data protection agreements, and they process your data only as instructed by FirstStep.ai.

b. Legal and Regulatory Disclosures

We may disclose your personal data if we believe in good faith that it is necessary to:

- Comply with a legal obligation, subpoena, or court order
- Cooperate with law enforcement or regulators
- Prevent or investigate fraud, abuse, or security threats
- Enforce our Terms of Use or defend against legal claims
- Protect the rights, safety, or property of FirstStep.ai, our users, or others

We will attempt to notify you of such disclosures unless prohibited by law or court order.

c. Business Transfers

If FirstStep.ai is involved in a merger, acquisition, restructuring, or sale of assets, your data may be disclosed to the acquiring entity as part of that process. We will ensure the confidentiality of your data and provide notice before any transfer that would result in a change to this Privacy Policy.

d. International Transfers

Where necessary, we may transfer your data to recipients in other countries with appropriate safeguards in place (see Section 10).

7. Your Rights

You have specific rights under the Data Protection Act 2017 and the General Data Protection Regulation (GDPR). These rights are exercisable at no cost, and we aim to respond to valid requests within 30 calendar days.

a. Right of Access

You may request a copy of the personal data we hold about you.

b. Right to Rectification

You may ask us to correct inaccurate or incomplete data.

c. Right to Erasure ("Right to be Forgotten")

You can request deletion of your personal data, where permitted by law.

d. Right to Restrict Processing

You can ask us to suspend the processing of your data in specific circumstances.

e. Right to Data Portability

You can request a copy of your data in a structured, machine-readable format to share with another service.

f. Right to Object

You may object to processing based on legitimate interest, direct marketing, or profiling.

g. Rights in Relation to Automated Decision-Making

You can request human review of any automated decisions that produce legal or similarly significant effects.

How to Exercise Your Rights

To make a request, contact our Data Protection Officer at: legal@firststep.ai

We may require you to verify your identity before responding. If we cannot comply with your request, we will explain why. You also have the right to lodge a complaint with the Data Protection Commissioner of Mauritius, or your local supervisory authority if you reside outside Mauritius.

8. Data Storage and Retention

We store your personal data securely and retain it only for as long as necessary to fulfil the purposes outlined in this Policy, or to meet legal, regulatory, or operational requirements.

a. Where We Store Your Data

Your data may be stored:

- On servers located in Mauritius or other jurisdictions with adequate data protection safeguards
- In cloud infrastructure hosted by trusted third-party providers bound by confidentiality and data protection obligations
- In secure backup systems for disaster recovery and business continuity purposes

Where data is transferred outside of Mauritius, we apply appropriate legal mechanisms such as Standard Contractual Clauses or equivalent safeguards (see Section 10).

b. Retention Period

We retain your data based on the following criteria:

- While your account remains active
- While you continue to use our services ("Active Use")
- As required by law (e.g., tax or compliance records)

Active Use is defined as:

- Logging into the platform within a 30-day period
- Maintaining active service hosting with data stored on FirstStep.ai systems

When neither condition is met, your data may be marked for deletion unless required to be retained for legal purposes.

c. Data Deletion and Archiving

- Data you delete may remain temporarily in backup systems for recovery purposes
- Full deletion from all systems, including backups, may take up to 30 days
- You may request deletion at any time via legal@firststep.ai

We implement policies to prevent accidental or malicious deletion and ensure retention periods are enforced systematically.

9. Security and Breach Response

We implement a layered security approach to protect your personal data from unauthorised access, misuse, loss, or disclosure.

a. Technical Safeguards

- Encryption of data in transit (TLS) and at rest using industry-standard algorithms
- Firewalls, anti-malware tools, and intrusion detection systems on all core infrastructure
- Regular security updates and vulnerability patching
- Secure development practices, including code reviews and environment isolation
- Audit logging of critical systems and access events

b. Organisational Safeguards

- Role-Based Access Control (RBAC) to ensure only authorised staff can access personal data
- Multi-Factor Authentication (MFA) for administrator access and remote systems
- Password policies enforcing complexity, expiry, and rotation
- Employee training on data protection, phishing, and breach prevention
- Confidentiality agreements for all staff and contractors handling personal data
- Physical access controls at data centres and office locations

c. Data Breach Response Plan

If a data breach occurs, we follow a structured protocol:

- Detection & Escalation
 - Breach indicators are monitored by automated systems and reported to our Privacy Lead
- Risk Assessment
 - We assess the severity and determine whether affected individuals and regulators must be notified
- Notification
 - High-risk breaches will be reported to the Data Protection Commissioner (Mauritius) within 72 hours
 - Affected individuals will be notified without undue delay, where required
- Containment & Recovery
 - We isolate affected systems, patch vulnerabilities, and restore service integrity
- Documentation
 - All incidents are recorded in a Data Breach Register including date, impact, response actions, and outcome
- Testing & Review
 - We conduct periodic breach response simulations to ensure readiness

These safeguards are reviewed regularly as part of FirstStep.ai's broader commitment to data protection and risk management.

10. Cross-Border Data Transfers

FirstStep.ai operates in multiple jurisdictions and may transfer your personal data to countries outside your own, including countries that may not offer the same level of data protection.

a. Legal Basis for Transfers

When transferring personal data internationally, we ensure that:

- The transfer is necessary for the performance of a contract with you, or
- Adequate safeguards are in place, such as:
 - Standard Contractual Clauses (SCCs) approved by the European Commission
 - Data protection agreements with third-party processors
 - Transfers to jurisdictions recognised as providing an adequate level of protection by applicable regulators

b. Safeguards

All recipients of personal data outside Mauritius or the European Economic Area (EEA) are required to:

- Process data only on documented instructions from FirstStep.ai
- Implement strict technical and organisational security measures
- Maintain confidentiality of all transferred data
- Cooperate fully with audits or impact assessments when required

c. Potential Risks

While we make every effort to protect your data, cross-border transfers may carry certain risks due to:

- Differences in privacy laws
- Potential lack of enforceable data subject rights in the destination country
- Government access laws that may not align with GDPR or DPA 2017 standards

We work to minimise these risks by using strong contractual protections and limiting the volume and type of data transferred where possible.

d. Contact for More Information

To learn more about the mechanisms in place for international data transfers, please contact our Data Protection Officer at legal@firststep.ai.

11. Cookies and Tracking

We use cookies and similar technologies to enhance your experience, analyse usage, and personalise content on our Websites and Mobile Apps. This section explains the types of cookies we use and how you can manage your preferences.

a. What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They help the website recognise your device and remember certain information about your preferences or past actions. Cookies are essential for the proper functioning of our services, improving user experience, and tracking usage patterns.

b. Types of Cookies We Use

- **Strictly Necessary Cookies** – These cookies are essential for the basic operation of the Websites and Mobile Apps. They enable functions like user authentication and access to secure areas. These cookies cannot be disabled.
- **Performance Cookies** – These cookies help us understand how visitors interact with our site by collecting anonymous data, such as the pages you visit and errors encountered. They are used to improve the performance and user experience of the site.
- **Functionality Cookies** – These cookies remember your preferences (e.g., language, region) and enhance the user experience by personalising content and appearance across sessions.
- **Targeting/Advertising Cookies** – These cookies are used to deliver ads that are more relevant to you and your interests. These cookies are only placed with your consent.

c. Third-Party Cookies

We may allow third-party service providers to place cookies on our Websites and Mobile Apps for purposes such as analytics or advertising. These third parties have their own privacy policies, and we encourage you to review them.

Some of the third-party providers we work with include Google Analytics and social media platforms.

d. Consent and Control

When you first visit our Websites and Mobile Apps, you will be prompted with a cookie banner, which allows you to:

- Accept All Cookies
- Reject Non-Essential Cookies
- Customise Preferences

You may change or withdraw your consent at any time by clicking the Cookie Settings link in the footer of the website.

e. Managing Cookies in Your Browser

Most browsers allow you to control cookie settings. You can typically:

- Delete cookies from your browser
- Block third-party cookies
- Set preferences for certain websites

For detailed instructions, consult your browser's help section.

12. Minors

Our services are not intended for children under the age of 16. We do not knowingly collect, process, or store personal data from minors.

If we discover that we have inadvertently collected personal data from a child under 16, we will take immediate steps to delete such information from our systems.

If you believe we may have collected data from a minor, please contact us at legal@firststep.ai or support@firststep.ai, and we will take appropriate action.

13. Third-Party Links

Our Websites and Mobile Apps may contain links to third-party websites, services, or applications that are not operated or controlled by FirstStep.ai. These third-party sites have their own privacy policies and terms of use, and we are not responsible for their content, practices, or the way they handle personal data.

We encourage you to read the privacy policies of any third-party websites or services before providing them with any personal data.

14. Compliance and Complaints

We are committed to protecting your privacy and ensuring compliance with applicable data protection laws, including the Data Protection Act 2017 and GDPR.

a. How We Ensure Compliance

We regularly review our data protection practices to ensure they align with the requirements of the Data Protection Act 2017, GDPR, and other applicable privacy regulations. We also ensure that our employees and partners are trained to understand and comply with these privacy requirements.

If you have any questions, concerns, or complaints regarding our privacy practices, we encourage you to contact us directly. We are committed to resolving your issues in a timely and transparent manner.

b. How to File a Complaint

If you are unsatisfied with how we handle your personal data or if you believe we have not addressed your privacy concerns appropriately, you have the right to lodge a complaint with the relevant supervisory authority in your jurisdiction. For complaints regarding data processing in Mauritius, you may contact the Data Protection Commissioner.

15. Policy Updates

FirstStep.ai reserves the right to modify or update this Privacy Policy at any time. Any changes we make to the Policy will be posted on this page, and the updated version will be effective as soon as it is published. The "Effective Date" at the top of the Privacy Policy will reflect the date of the latest revision.

We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting your personal data. Your continued use of the Websites and Mobile Apps after any changes to this Privacy Policy will constitute your acceptance of those changes.

16. Contact Information

If you have any questions, comments, or concerns about this Privacy Policy or our data processing practices, please reach out to us.

For privacy-related inquiries, please contact our Data Protection Officer at: legal@firststep.ai

For support or general inquiries, email: support@firststep.ai